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SANDRA LE

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

SANDRA LE,

Defendant.

Case No. CR 21-00331 WHO

**STIPULATION AND [PROPOSED]  
ORDER CONTINUING STATUS  
HEARING, EXCLUDING TIME AND  
EXTENDING THE DEADLINES UNDER  
THE SPEEDY TRIAL ACT**

It is stipulated by and between counsel for the United States and counsel for the defendant, Sandra Le, that the status conference scheduled for September 16, 2021 at 1:30 PM before the Hon. William H. Orrick be vacated and rescheduled for October 28, 2021 at 1:30 PM.

The reasons for this request are as follows:

1. The defendant appeared before the Honorable Joseph C. Spero on August 31, 2021 for her initial appearance on the Indictment. Dkt. 3.
2. Ms. Le then appeared before the Honorable Sallie Kim on September 15, 2021 for identification of counsel and a status conference. Dkt. 10. At this hearing, defense counsel made a general appearance on behalf of Ms. Le. The government then informed the Court that they would provide defense counsel discovery later this week in light of their representation. At this time, defense counsel has not yet received discovery.



**[PROPOSED] ORDER**

Based upon the facts set forth in the stipulation of the parties and for good cause shown, the Court vacates the status conference scheduled for September 16, 2021 at 1:30 P.M. and reschedules it for October 28, 2021 at 1:30 PM. The Court further finds that failing to exclude the time from September 16, 2021 through October 28, 2021 would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from September 16 through October 28, 2021 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial.

Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time from September 16, 2021 through October 28, 2021 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

DATED: \_\_\_\_\_

HON. WILLIAM H. ORRICK  
United States District